

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 3:20-cr-30100 SMY
)	
PHILIP REIS,)	
)	
Defendants.)	

MOTION TO TRAVEL

COMES NOW Defendant, Philip Reis, by and through counsel, and hereby moves this Court, pursuant to 18 U.S.C. § 3145(a)(2), to permit him to travel out of district for the purposes identified below. In support of this motion, Defendant states as follows:

1. Defendant is charged with a single count of Attempted Enticement of a Minor.
2. On July 1, 2020, this Court admitted Defendant to bail on a combination of conditions of release, [Doc. Text #13], determining that the conditions imposed would reasonably assure both his appearance at trial and the safety of the community.
3. Condition (f) is among the conditions imposed by this Court. Condition (f) prohibits Defendant from traveling outside the Southern District of Illinois and Eastern District of Missouri. Defendant wishes to travel to Litchfield, Illinois to meet with counsel on an unrelated matter.
4. If permitted to do so, Defendant would be driven by his son to Litchfield on June 28, 2021. While in Litchfield, Defendant would meet with his attorney, Bradley Bauer, at his office located at 703 W. Union Ave, Suite 3, Litchfield, Illinois 62056. He

would return home immediately following his appointment and anticipates the entire trip should take no more than six hours.

5. Defendant will provide any additional information requested by the Pretrial Services Office.
6. To date, Defendant has complied with all conditions of bond.
7. Defendant has given no reason to this Court or any individual to presume that his travel will present either a meaningful risk of flight or a danger to the community.
8. Defendant, through counsel, has discussed this matter with assistant United States attorney, Alexandria Burns. Ms. Burns has no objection to Defendant's request.
9. Defendant, through counsel, has also discussed this matter with Pretrial Services Officer, Brenda Tate. Ms. Tate has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to travel outside of the district for the purposes identified above.

Respectfully Submitted,

ROSENBLUM, SCHWARTZ & FRY, PC

By: /S/ Marc Johnson
MARC JOHNSON, 58065MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
St. Louis, Missouri 63105
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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2021, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Alexandria Burns, assistant United States attorney.